Pauley, Melissa

From: Silawsky, Donald [Donald.Silawsky@hq.doe.gov]
Sent: Wednesday, April 16, 2008 5:02 PM
To: Pauley, Melissa; Fadely, Karen
Subject: FW: statement for the record re: Doc. no. DOE/EIS-0385

-----Original Message-----
From: Steve Shepard [mailto:shepart@datasync.com]
Sent: Wed 4/9/2008 3:56 PM
To: Silawsky, Donald
Subject: statement for the record re: Doc. no. DOE/EIS-0385

Donald Silawsky

Office of Petroleum Reserves (FE-47)

U.S. Department of Energy

1000 Independence Ave, SW

Washington, D.C. 20585-0301

Re: Doc. no. DOE/EIS-0385

Dear Mr. Silawsky:

On behalf of the Sierra Club's MISSISSIPPI STATE CHAPTER, please accept the following comments into the official public record regarding the RICHTON SALT DOME'S USE AS A SITE FOR EXPANSION OF THE STRATEGIC PETROLEUM RESERVE. We represent 1200 members who are opposed to this proposal based on the issues raised below.

1. The Sierra Club opposes the use of the Richton Salt Dome for oil storage. This site's location between the Leaf River-Tallahalla Creek to the West and the Chickasawhay River to the East--each significantly natural, free-flowing streams in an ecologically important part of the continental United States, makes this industrialization and planned degradation an unwise use of a region that in the long run can be developed into an eco-tourist destination. Endangered species are threatened with this proposal, and the Gulf Coast below this site is potentially threatened essential fish habitat under the Magnuson-Stevens Fisheries Act.

Considering there are over 500 salt domes in the Gulf Coast area between Texas and northwest Florida, it is incumbent on the DOE to do a thorough, scientifically justifiable study as to why the Richton salt dome is the best site (out of 500 choices) for the expansion of the SPR. Currently, DOE has failed to consider all practicable alternatives, and as such must complete an Environmental Impact Statement (EIS), which will include the No Build Alternative.

2. The proposal has serious ecological impacts associated with it from both short-term and long-term perspectives. DOE's current proposal does little, if anything, to minimize the environmental impacts of this project.

History has shown how destructive oil pipelines are on our wetlands and they have exacerbated coastal erosion throughout Mississippi and the Gulf Coast. This proposal will destroy hundreds of acres of wetlands directly, and its indirect impact from altering hydrology, will further result in degrading wetlands and the loss of wetlands. As such, we assert that new pipeline routes must avoid wetlands, and instead be directed along existing public or already-impacted right-of-ways. Oil pipelines should be run in public areas. The well-established roads in South Mississippi have already cut through wetlands. Those right-of-ways should be used for laying down pipes for two reasons: First, to avoid creating a separate development scar through wetlands, further cutting them up and doubling ecological damage. Secondly, a pipeline near a road can be

easily watched for leaks.

Currently, oil pipelines are scheduled to be laid from Liberty, MS, to Richton, MS, and down to Pascagoula, MS. If these pipelines follow established highways that already traverse these routes, we have the least damaging of options in a very sensitive wetland-dominated region of our country.

We also assert that the recent 2005 hurricane season was a clear reminder of the important role wetlands play in protecting communities from flood and storm surge, support healthy fisheries and wildlife habitat, and promote clean water. Rather than encouraging the destruction of from 200 to 1000 acres of our valuable wetlands, our state and federal agencies must strive to protect these resources for public health and protection, economic prosperity, and a healthy environment.

3. Furthermore, DOE has failed to adequately provide evidence as to why the water must be removed from the Pascagoula River, a waterway recognized by the state as a Scenic River and a system whose volume has already been shown by the Mississippi DEQ to have been threatened and diminished in recent years. Instead, the water needed for hollowing out the salt dome should be piped from the Mississippi River. The Mississippi River's flow rate is 600 times the flow rate of the Pascagoula. The Mississippi River will never miss 50 million gallons per day. However, there should be a plankton study conducted to determine if larval and planktonic life forms destroyed in the intake of this water could impact aquatic resources in the Mississippi River before this project is undertaken. Needless to say, if the Leaf or Pascagoula River are used over the objections of the Sierra Club, such studies should also be undertaken to determine the short and long term biological impacts that are expected when water is pumped into the salt dome in order to hollow it out.

4. The current plan to pipe the salt sludge through pipelines down to the Gulf of Mexico off Horn Island Pass is unacceptable. We propose that if the Richton Salt Dome is to be used, the salt sludge obtained through the hollowing-out process should be deep-well injected back into similar strata underground where the dome is located. This process is feasible all over the United States. If there is some technical or scientific reason why this process cannot be done in Richton, MS, we need the DOE to supply the technical information explaining this as part of this plan.

If the salt sludge obtained from the hollowing out process must be dumped in nearby waters, the Sierra Club reluctantly proposes that the least damaging alternative for salt dumping be the Mississippi River. A pipeline from Richton to the Mississippi River can follow public roads and reach no further in miles than a similar pipeline proposed to reach the Gulf of Mexico off Horn Island Pass. The Mississippi River can absorb and transport the salt more effectively and with the least biological harm to the Gulf of Mexico than the proposed dump site off Horn Island Pass. However, a study of this alternative, even if rejected due to political pressure, should be included in this proposal. Part of that study should be any biological damage to aquatic resources of the Mississippi River.

If the salt sludge must be sent from Richton to Pascagoula, across the Mississippi Sound and out to Horn Island Pass as presently proposed, the pipeline for this purpose must minimize wetland disturbance and follow established state highways. Pipeline right-of-ways through secluded swamps and wetlands and riverine bottomlands, as presently proposed, is unacceptable and will be vigorously opposed. Secluded pipelines, when leaks occur, will not easily be discovered. Pipelines following highways will be more easily monitored and leaks more easily found and corrected. The potential damage of salt sludge leaking into old-growth protected swamps is too great to allow the pipes exclusive right-of-ways as currently proposed and no right-of-ways should be granted in Nature Conservancy or Pascagoula Game Management properties where old-growth trees and natural ecosystems are protected preserves. Cutting through these areas has a scientifically verified negative impact on bird populations as well as overall plant and animal diversity. These secluded pipelines may also be opposed as a threat to endangered species.

5. The Sierra Club vigorously opposes present pipeline intake locations. The Leaf River intake will draw too much water per day over a five-year period considering the annual dry period flow rates and the possibility for a continuation of our ongoing historic drought. The only conceivable alternative is drawing water from the Mississippi River. The proposed alternative pipeline in conjunction with the Leaf River intake run through swamps and wetlands to Horn Island Pass is also unacceptable. This alternative pipeline is first of all located in isolated sensitive wetlands and should be placed alongside existing highways as with all other pipelines in this project. It is further unacceptable because the intake will be in an area that is part of the fertile fisheries crescent of the Northern Gulf of Mexico where intake water will extract valuable larval marine life forms and plankton upon which economically valuable marine life forms feed. This sterilizing effect in Magnuson-Fisheries Essential Fish Habitat will be opposed by Sierra Club in the courts, if necessary.

At the very least, a scientific study of the plankton expected to be extracted in this process should be funded by the DOE prior to the building of any pipelines for this purpose.

A separate scientific study of plankton expected to be extracted should also be undertaken for the Leaf River and Merrill proposed intake sites.

Sierra Club opposes the Merrill pipe intake site. This site's historic significance is already known. In addition, the intake of 50 million gallons proposed per day at this location is too great if the current or a new drought should occur during the five year period or later during times when water is needed for extracting stored oil. Also, even when annual rain fall is normal, the flow rate in average annual dry periods is too low to allow the extraction of 50 million gallons per day.

Horn Island Pass is a known critical habitat for the endangered Gulf of Mexico Sturgeon. The salt sludge dumping outside Horn Island Pass is likely to negatively impact this habitat. Regardless, we request that an independent committee of non-biased scientists be appointed to review and study this proposal and alternatives so that the least damaging proposal is determined, including the No Build Alternative. This supports our request for an EIS.

6. The Pascagoula Ship Channel is an important location for local shrimpers to make their living. Our present understanding of tides, currents and wind-driven water flow suggest salt sludge dumping off Horn Island Pass will result in elevated salinities where shrimpers spend their entire season catching shrimp. Elevated salinities are likely to disperse shrimp and eliminate this area as a source of livelihood for local shrimpers. For this reason, and for the many questions about other economically valuable marine resources, Sierra Club will oppose this sludge-dumping site on the grounds that Essential Fish Habitat is compromised and therefore illegal under existing law.

At the very least, DOE should fund scientific studies of currents, bottom types in the area of the sludge dumping, mapping of anticipated dispersal of salt sludge prior to building any salt sludge pipelines. Salt is responsible for currents in our oceans, a new infusion of salt off Horn Island Pass may very well lead to entirely new current patterns that could negatively impact inshore areas in unforeseen ways. Studies predicting current patterns following salt dumping must be carried out before any actual salt dumping occurs.

7. Before salt is extracted on a large scale from the Richton Salt Dome, the salt should be chemically evaluated to make sure no impurities or contaminants in the salt are dangerously toxic. This promise of chemical evaluation should be included in the EIS.

CONCLUSION:

The Richton Salt Dome is a dangerously isolated location for a SPR. Even though the site itself can be secured, pipelines are entirely too long and run through entirely too isolated areas to be protected from attacks from sleeper cells. Part of the justification for this site is its inland location. If the Pascagoula Refinery is damaged from a hurricane, and it is the proposed site for refining this oil, what good is the inland location?

Since our leaders in Washington have assured us that the enemy is hidden all over the United States, and not a single sleeper cell has been found since 9-11, they are out there among us now. A sleeper cell could easily activate following a hurricane that damages the oil fields and refineries of the Gulf. Such a cell could easily disable the isolated pipelines running from this SPR site and exacerbate the oil crisis resulting from the hurricane. In the event of an oil embargo, sleeper cells could activate and then disable the pipelines running from Richton to Pascagoula and eliminate the use of this oil exactly when needed in such a crisis. There is no security justification for using the Richton SPR. Sierra Club opposes it on the grounds of preventing environmental and economic degradation in south Mississippi, but further questions the security justification at the very basis of choosing this site.

The Sierra Club Mississippi Chapter appreciates the opportunity to comment on this proposal, and we request a written response to the issues raised herein. Further, we ask to be notified immediately in writing of any changes made to the current proposal.

Steve Shepard

Gulf Coast Group Chair

Mississippi Chapter of the Sierra Club

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Cc: U.S. FWS

EPA

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Sun Herald

MS Press

Clarion-Ledger

Gene Taylor

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